

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

BARBARA LEE, *et al.*,

Plaintiff,

v.

VIRGINIA STATE BOARD OF ELECTIONS,  
*et al.*,

Defendants.

No. 3:15CV357 HEH

**DEFENDANTS' MOTION TO FILE DOCUMENTS UNDER SEAL REGARDING  
EXHIBITS A, B, G AND H TO MEMORANDUM IN SUPPORT OF DEFENDANTS'  
MOTION FOR PARTIAL SUMMARY JUDGMENT REGARDING DPVA'S STANDING  
TO ASSERT CLAIMS ON BEHALF OF INDIVIDUAL VOTERS ALLEGEDLY  
IMPACTED BY VIRGINIA'S VOTER IDENTIFICATION LAW**

Defendants Virginia State Board of Elections; James B. Alcorn, in his capacity as Chairman of the Virginia State Board of Elections; Dr. Clara Belle Wheeler, in her capacity as Vice-Chair of the Virginia State Board of Elections; Singleton B. McAllister, in her capacity as Secretary of the Virginia State Board of Elections; the Virginia Department of Elections; and Edgardo Cortés, in his capacity as Commissioner of the Virginia State Board of Elections (collectively "Defendants"), by and through counsel, pursuant to Rule 5 of the Local Civil Rules, respectfully move for an order granting Defendants' Motion to File Under Seal Exhibits A, B, G and H to its Memorandum In Support of Defendants' Motion for Partial Summary Judgment Regarding DPVA's Standing to Assert Claims on Behalf of Individual Voters Allegedly Impacted by Virginia's Voter Identification Law.

Exhibits A, B, G and H to Defendants' Motion for Partial Summary Judgment sought to be filed under seal are being filed under seal via the court's ECF website contemporaneously herewith as allowed by Local Civil Rule 5. The grounds for this motion are set forth in the accompanying Memorandum in Support of this Motion.

A proposed order is attached.

DATED: February 5, 2016

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via the Court's CM/ECF system  
on February 5, 2016, to the following:

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